

EXHIBIT D

Redacted Verost Declaration

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**DIRECT TESTIMONY DECLARATION OF ADAM W. VEROST IN SUPPORT OF
DIGITAL CURRENCY GROUP, INC.'S AND DCG INTERNATIONAL
INVESTMENTS LTD.'S OBJECTION AND RESERVATION OF RIGHTS TO
DEBTORS' MOTION FOR ENTRY OF AN ORDER APPROVING A
SETTLEMENT AGREEMENT BETWEEN THE DEBTORS AND THE NEW YORK
STATE OFFICE OF THE ATTORNEY GENERAL**

I, Adam W. Verost, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury
that:

1. I submit this declaration (the “**Second Verost Declaration**”) to provide the
testimony I would give at a hearing in support of Digital Currency Group, Inc.’s and DCG
International Investments Ltd.’s (collectively, “**DCG**”) objection and reservation of rights (the
“**Objection**”) to the *Debtors’ Motion for Entry of an Order Approving a Settlement Agreement
between the Debtors and the New York State Office of the Attorney General* (Docket No. 1275).

2. I have previously submitted the *Declaration and Direct Testimony of Adam W.
Verost in Support of DCG’s Objection to Confirmation of the Amended Joint Plan of Genesis
Global Holdco, LLC, et al.*, (Docket No. 1328) (the “**First Verost Declaration**”), which among
other things, [REDACTED]

¹ The debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number (or equivalent identifier), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R) (collectively, the “**Debtors**”). For the purpose of these chapter 11 cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

[REDACTED]²

3. I am submitting this Second Verost Declaration to update the [REDACTED]
[REDACTED] The
statements in this Second Verost Declaration are, except as otherwise noted, based on information
that is publicly available, provided by the Debtors or their advisors, or other interested parties, my
personal knowledge, and Ducera's employees working directly with me or under my supervision
or direction.

High and Low Case Recoveries

4. Excess Value [REDACTED]
[REDACTED]
[REDACTED] Creditor recovery on Petition Date Claims based
on the Distribution Principles [REDACTED]

5. In particular, I update paragraphs 15-19 of the First Verost Declaration [REDACTED]
[REDACTED] as follows:

[REDACTED]

² Capitalized terms used herein but otherwise not defined shall have the meanings given to such terms in the First Verost Declaration or the Objection, as applicable.

6. Excess Value [REDACTED] if
the adjustments [REDACTED]
[REDACTED] Creditor recovery on Petition Date Claims based
on the Distribution Principles [REDACTED]

7. In particular, I update paragraphs 22-25 from the First Verost Declaration [REDACTED]
[REDACTED] as follows:

[REDACTED]

* * *

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
and correct.

³ Reflects Debtors' estimated impact of using December 31, 2023 pricing. Impact of additional update to February 20, 2024 pricing included in "Update for February 20, 2024 Pricing" column.

⁴ Reflects Debtors' estimated impact of using December 31, 2023 pricing. Impact of additional update to February 20, 2024 pricing included in "Update for February 20, 2024 Pricing" column.

Dated: February 21, 2024
New York, New York

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